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April 10, 2020

By ECF/Email

Hon. Judge Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Amado Alonzo
19 Cr. 721 (LAK)**

Honorable Judge Kaplan:

I write to seek an order granting the release of Amado Alonzo—a 51-year-old man with hypertension and high cholesterol—from the Westchester County Jail (WCJ). Mr. Alonzo has consented to detention since his initial presentment in this case, and he pleaded guilty in January to a narcotics conspiracy and a money laundering conspiracy. He requests bail now because of the serious risk to his health posed by the deadly coronavirus COVID-19.

As of April 5, 2020, 24 prisoners and 60 staff at the WCJ had tested positive for COVID-19.¹ Another 73 people had been tested based on an assessment by medical staff and were awaiting test results.² Although in other cases the Government has reported steps taken by the WCJ to slow the spread of the virus, those steps are not being followed and are proving insufficient.

Mr. Alonzo, meanwhile, is neither a flight risk nor a danger. Prior to this case, he had no involvement with the criminal justice system. He has no history of violence whatsoever. He has lived in New York almost continuously since 1992. He has a girlfriend and four children in New York and one child in New Jersey. Although he faces the possibility of a substantial sentence in this case, the Government agrees that he is eligible for the safety valve and played a minor role in both of the conspiracies he was involved in.

I therefore request his temporary release under 18 U.S.C. § 3145(c). I propose that the Court authorize his release on a \$75,000 bond signed by three financially responsible persons and place him on home incarceration with electronic monitoring.

¹ Exhibit A, *United States v. Willie Sims*, 19 Cr. 857 (NSR), Letter to Court from USA re: WCJ Response to COVID-19 (Apr. 5, 2020).

² *Id.*

MEMORANDUM ENDORSED

Motion denied substantially for reasons stated in the government's response.

SO ORDERED

my Kaplan 5/28/2020